

**THE RECLAMATION BOARD**

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May 18, 2007

Lieutenant General Carl A. Strock  
Commander and Chief of Engineers  
United States Army Corps of Engineers  
441 G Street, Northwest  
Washington, DC 20314-1000

Dear General Strock:

We are writing to you as members of the California Reclamation Board to express our concerns over a new policy of the U.S. Army Corps of Engineers (Corps) requiring removal of virtually all vegetation from federal levees in California and for the proposed enforcement of the 15-foot vegetation-free zone adjacent to the levee toes. As the State's flood control agency, and your partner in managing flooding along the Sacramento and San Joaquin Rivers and their tributaries for nearly a century, we enjoy a history of cooperation in our joint mission to provide public safety for the citizens of California through management of the State-federal adopted plan of flood control.

The removal of vegetation, in particular the trees that have grown on California's project levees, and the strict enforcement of the 15-foot vegetation-free zone requirement would be an enormous task that would require a huge amount of time and money. While we applaud your efforts to improve public safety, this new policy would constitute a significant shift in the Corps' practice in California and could have serious unintended environmental consequences.

We urge the Corps to work with us and other State, federal, and local agencies in California to refine the new policy and to formulate a process and timeline to integrate the Corp's policy into California's strategic initiative, known as FloodSAFE California. As the FloodSAFE California initiative moves forward, new operation and maintenance standards need to be properly staged and coordinated to assure that State and local agencies are given ample time to plan, design, finance, and execute the projects needed to achieve compliance with the new policy. It is also very important that implementation of new standards be prioritized so that the most critical public safety actions will have first call on limited federal, State, and local dollars.

Under FloodSAFE California, the State of California is repairing and improving flood control systems, improving maintenance, and enhancing emergency response capability. With the passage of the Disaster Preparedness and Flood Prevention Bond Act of 2006 (Proposition 1E) and the Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Bond Act of 2006 (Proposition 84), the State seeks the federal government's support and cost sharing to promote multipurpose projects that provide flood management, habitat, agricultural, water quality, recreational, and open space benefits.

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Implementation of the Corps' policy guidance dictating the level of levee maintenance needs to be consistent with existing environmental laws and maintenance requirements, and should be integrated with federal, State, and local efforts to improve the State-Federal Flood Control System. If the Corps' policy guidance precedes other activities for improving State flood control, it will likely redirect federal, State, and local investments away from critical levee repairs to operations and maintenance issues related to right-of-way acquisitions and vegetation management which may not significantly reduce overall system risk.

The uniqueness of California's flood system and emphasis on habitat preservation warrants a more flexible vegetation management policy than one that would simply clarify and strictly enforce inspection and maintenance standards that were adopted 50 years ago. Therefore, prior to implementing any new policies or guidance related to levee operations and maintenance, we urge the Corps to work collaboratively with the State and federal resource agencies, as well as State and local levee maintenance agencies. We look forward to working with you to revise and fully develop this new policy.

If you have any questions, please contact any one of us, or your staff may call Jay S. Punia, General Manager of the Board, at (916) 547-0609, or by e-mail at [jpunia@water.ca.gov](mailto:jpunia@water.ca.gov).

Sincerely,

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Benjamin F. Carter, President

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Francis "Butch" Hodgkins, Vice-President

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Maureen "Lady Bug" Doherty, Secretary

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Rose Marie Burroughs, Member

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Teri E. Rie, Member

Benjamin F. Carter, President  
Francis "Butch" Hodgkins, Vice-President  
Maureen "Lady Bug" Doherty, Secretary  
Rose Marie Burroughs, Member  
Teri E. Rie, Member

cc: (See Attached List).

cc: Brigadier General John R. McMahon  
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